

4. This allegation is no longer relevant as the Court has already dismissed the claim on which this allegation is based. D'Agostino further denies the allegations in paragraph 4 of the FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4 of the FAC as it relates to others.

5. This allegation is no longer relevant as the Court has already dismissed the claim on which this allegation is based. D'Agostino further denies the allegations in paragraph 5 of the FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 5 of the FAC as it relates to others.

6. This allegation is no longer relevant as the Court has already dismissed the claim on which this allegation is based. D'Agostino further denies the allegations in paragraph 6 of the FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 6 of the FAC as it relates to others.

7. This allegation is no longer relevant as the Court has already dismissed the claim on which this allegation is based. D'Agostino further denies the allegations in paragraph 7 of the FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 7 of the FAC as it relates to others.

8. This allegation is no longer relevant as the Court has already dismissed the claim on which this allegation is based. D'Agostino further denies the allegations in paragraph 8 of the FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 8 of the FAC as it relates to others.

9. This allegation is no longer relevant as the Court has already dismissed the claim on which this allegation is based. D'Agostino further denies the allegations in paragraph 9 of the

FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 9 of the FAC as it relates to others.

10. This allegation is no longer relevant as the Court has already dismissed the claim on which this allegation is based. D'Agostino further denies the allegations in paragraph 10 of the FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 10 of the FAC as it relates to others.

11. This allegation is no longer relevant as the Court has already dismissed the claim on which this allegation is based. D'Agostino further denies the allegations in paragraph 11 of the FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 11 of the FAC as it relates to others.

12. Denies the allegations in paragraph 12 of the FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 12 of the FAC as it relates to others.

13. Denies the allegations in paragraph 13 of the FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13 of the FAC as it relates to others.

14. Denies the allegations in paragraph 14 of the FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 14 of the FAC as it relates to others.

15. This allegation is no longer relevant as the Court has already dismissed the claim on which this allegation is based. D'Agostino further denies the allegations in paragraph 15 of the FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15 of the FAC as it relates to others.

16. Denies the allegations in paragraph 16 of the FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16 of the FAC as it relates to others.

17. Denies the allegations in paragraph 17 of the FAC, but admits that Plaintiffs invoke diversity jurisdiction and that the Plaintiffs allege an amount in controversy in excess of \$75,000.

18. Denies the allegations in paragraph 18 of the FAC.

19. Denies the allegations in paragraph 19 of the FAC.

20. Denies the allegations in paragraph 20 of the FAC, except D'Agostino has been in the Southern District of New York during some of the times discussed in the FAC.

21. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 21 of the FAC.

22. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22 of the FAC.

23. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 23 of the FAC.

24. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 24 of the FAC.

25. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 25 of the FAC.

26. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 26 of the FAC.

27. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 27 of the FAC.

28. Denies the allegations in paragraph 28 of the FAC, except D'Agostino admits that he is a dual citizen of Venezuela and Spain and that he graduated from Boston College in Massachusetts. D'Agostino denies that he personally owns the home at 82 Elm Street, Southhampton, NY 11968. D'Agostino admits that he rents a townhouse at 10 East 75th Street, New York and he formerly rented an apartment at 807 Park Avenue.

29. Denies the allegations in paragraph 29 of the FAC, except D'Agostino admits that he used to be a part owner of a management company based at 450 Park Avenue, New York.

30. Denies the allegations in paragraph 30 of the FAC, but admits that he was served personally with the Summons and Complaint in this action at 82 Elm Street, Southhampton, New York.

31. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 31 of the FAC.

32. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 32 of the FAC.

33. Denies the allegations in paragraph 33 of the FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 33 of the FAC as it relates to others.

34. Denies the allegations in paragraph 34 of the FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 34 of the FAC as it relates to others.

35. Denies the allegations in paragraph 35 of the FAC as it relates to him and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 35 of the FAC as it relates to others.

36. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36 of the FAC.

37. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 37 of the FAC.

38. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 38 of the FAC.

39. Denies the allegations in paragraph 39 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 39 of the FAC as it relates to others other than D'Agostino admits that the other defendants are involved with Derwick.

40. Admits that Defendants Betancourt and Trebbau moved to dismiss the Original Complaint. The document speaks for itself. In all other respects, the allegations in paragraph 40 are denied.

DETAILED ALLEGATIONS

41. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 41 of the FAC.

42. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 42 of the FAC.

43. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 43 of the FAC.

44. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 44 of the FAC.

45. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 45 of the FAC.

46. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 46 of the FAC.

47. Denies the allegations in paragraph 47 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 47 of the FAC as to the others.

48. This allegation is no longer relevant as the Court has already dismissed the claims related to this allegation. D'Agostino further denies the allegations in paragraph 48 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 48 of the FAC as it relates to others.

49. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 49 of the FAC.

50. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 50 of the FAC.

51. Denies the allegations in paragraph 51 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 51 of the FAC as to the others.

52. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 52 of the FAC.

53. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 53 of the FAC.

54. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 54 of the FAC.

55. Paragraph 55 of the FAC is no longer relevant as the Court has already dismissed the claims related to these allegations and thus the allegations are denied.

56. Paragraph 56 of the FAC is no longer relevant as the Court has already dismissed the claims related to these allegations and thus the allegations are denied.

57. Paragraph 57 of the FAC is no longer relevant as the Court has already dismissed the claims related to these allegations and thus the allegations are denied.

58. Paragraph 58 of the FAC is no longer relevant as the Court has already dismissed the claims related to these allegations and thus the allegations are denied.

59. Paragraph 59 of the FAC is no longer relevant as the Court has already dismissed the claims related to these allegations and thus the allegations are denied.

60. Paragraph 60 of the FAC is no longer relevant as the Court has already dismissed the claims related to these allegations and thus the allegations are denied.

61. Paragraph 61 of the FAC is no longer relevant as the Court has already dismissed the claims related to these allegations and thus the allegations are denied.

62. Paragraph 62 of the FAC is no longer relevant as the Court has already dismissed the claims related to these allegations and thus the allegations are denied.

63. Paragraph 63 of the FAC is no longer relevant as the Court has already dismissed the claims related to these allegations and thus the allegations are denied.

64. Paragraph 64 of the FAC is no longer relevant as the Court has already dismissed the claims related to these allegations and thus the allegations are denied.

65. Paragraph 65 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

66. Paragraph 66 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

67. Paragraph 67 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

68. Paragraph 68 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

69. Paragraph 69 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

70. Paragraph 70 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

71. Paragraph 71 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

72. Paragraph 72 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

73. Paragraph 73 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

74. Paragraph 74 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

75. Paragraph 75 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

76. Paragraph 76 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

77. Paragraph 77 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

78. Paragraph 78 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

79. Paragraph 79 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

80. Paragraph 80 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

81. Paragraph 81 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

82. Paragraph 82 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

83. Paragraph 83 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

84. Paragraph 84 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

85. Paragraph 85 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

86. Paragraph 86 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

87. Paragraph 87 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

88. Paragraph 88 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

89. Paragraph 89 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

90. Paragraph 90 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

91. Paragraph 91 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

92. Paragraph 92 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

93. Paragraph 93 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

94. Paragraph 94 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

95. Paragraph 95 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

96. Paragraph 96 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

97. Paragraph 97 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied. To the extent Plaintiffs intend to argue it is relevant, the allegation is denied.

98. Paragraph 98 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied. To the extent Plaintiffs intend to argue it is relevant, the allegation is denied.

99. Paragraph 99 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied. To the extent Plaintiffs intend to argue it is relevant, the allegation is denied.

100. Paragraph 100 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

101. Paragraph 101 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

102. Paragraph 102 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

103. Paragraph 103 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

104. Paragraph 104 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

105. Paragraph 105 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

106. Paragraph 106 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

107. Paragraph 107 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

108. Paragraph 108 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

109. Paragraph 109 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

110. Paragraph 110 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

111. Paragraph 111 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

112. Paragraph 112 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

113. Paragraph 113 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

114. Paragraph 114 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

115. Paragraph 115 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

116. Paragraph 116 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

117. Paragraph 117 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

118. Paragraph 118 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

119. Paragraph 119 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

120. Paragraph 120 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

121. Paragraph 121 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

122. Paragraph 122 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

123. Paragraph 123 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

124. Paragraph 124 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

125. Paragraph 125 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

126. Paragraph 126 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

127. Paragraph 127 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

128. Paragraph 128 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

129. Paragraph 129 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

130. Paragraph 130 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

131. Paragraph 131 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

132. Paragraph 132 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

133. Paragraph 133 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

134. Paragraph 134 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

135. Paragraph 135 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

136. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 136 of the FAC.

137. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 137 of the FAC.

138. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 138 of the FAC.

139. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 139 of the FAC.

140. Denies the allegations in paragraph 140 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 140 of the FAC as it relates to others.

141. Denies the allegations in paragraph 141 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 141 of the FAC as it relates to others.

142. Denies the allegations in paragraph 142 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 142 of the FAC as it relates to others.

143. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 143 of the FAC.

144. Denies the allegations in paragraph 144 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 144 of the FAC as it relates to others.

145. Denies the allegations in paragraph 145 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 145 of the FAC as it relates to others.

146. Denies the allegations in paragraph 146 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 146 of the FAC as it relates to others.

147. Denies the allegations in paragraph 147 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 147 of the FAC as it relates to others.

148. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 148 of the FAC.

149. Denies the allegations in paragraph 149 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 149 of the FAC as it relates to others.

150. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 150 of the FAC.

151. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 151 of the FAC.

152. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 152 of the FAC.

153. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 153 of the FAC.

154. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 154 of the FAC.

155. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 155 of the FAC.

156. Denies the allegations in paragraph 156 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 156 of the FAC as it relates to others.

157. Denies the allegations in paragraph 157 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 157 of the FAC as it relates to others.

158. Denies the allegations in paragraph 158 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 158 of the FAC as it relates to others.

159. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 159 of the FAC.

160. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 160 of the FAC.

161. Denies the allegations in paragraph 161 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 161 of the FAC as it relates to others.

162. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 162 of the FAC.

163. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 163 of the FAC.

164. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 164 of the FAC.

165. Denies the allegations in paragraph 165 of the FAC, except he admits that Betancourt and Trebbau are involved with Derwick Associates.

166. Denies the allegations in paragraph 166 of the FAC.

167. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 167 of the FAC.

168. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 168 of the FAC.

169. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 169 of the FAC.

170. Admitted that D'Agostino texted Thor Halvorssen-Mendoza and that D'Agostino knew him from his childhood. In all other respects, denied.

171. Admitted that D'Agostino discussed an article about Derwick with Thor Halvorssen-Mendoza and offered to put him in touch with the other defendants so he could obtain information from them before publishing the article. In all other respects, denied.

172. D'Agostino admits that he was willing to put Thor-Halverssen-Mendoza in touch with the other defendants so they could provide whatever information he needed. In all other respects, D'Agostino denies the allegations in paragraph 172 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 172 of the FAC as it relates to others.

173. Admits that D'Agostino invited Thor Halvorssen-Mendoza to dinner so that he could meet Betancourt and, with the admission above, in all other respects, denied.

174. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 174 of the FAC.

175. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 175 of the FAC.

176. Admits that D'Agostino has exchanged text messages with Thor Halverssen-Mendoza. In all other respects, denied.

177. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 177 of the FAC.

178. Paragraph 178 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

179. Paragraph 179 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

180. Paragraph 180 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

181. Paragraph 181 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

182. Paragraph 182 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

183. Paragraph 183 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

184. Paragraph 184 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

185. Paragraph 185 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

186. Paragraph 186 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

187. Paragraph 187 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

188. Paragraph 188 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

189. Paragraph 189 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

190. Paragraph 190 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

191. Paragraph 191 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

192. Paragraph 192 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

193. Paragraph 193 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

194. Paragraph 194 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

195. Paragraph 195 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

196. Paragraph 196 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

197. Paragraph 197 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

198. Paragraph 198 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

199. Paragraph 199 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

200. Paragraph 200 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

201. Paragraph 201 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

202. Paragraph 202 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

203. Paragraph 203 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

204. Paragraph 204 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

205. Paragraph 205 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

206. Paragraph 206 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

207. Paragraph 207 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

208. Paragraph 208 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

209. Paragraph 209 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

210. Paragraph 210 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

211. Paragraph 211 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

212. Paragraph 212 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

213. Paragraph 213 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

214. Paragraph 214 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

215. Paragraph 215 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

216. Paragraph 216 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

217. Paragraph 217 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

218. Paragraph 218 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

219. Paragraph 219 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

220. Paragraph 220 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

221. Paragraph 221 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

222. Paragraph 222 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

223. Paragraph 223 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

224. Paragraph 224 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

225. Paragraph 225 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

226. Paragraph 226 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

227. Paragraph 227 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

FIRST CLAIM FOR RELIEF
Racketeer Influence and Corrupt Organizations Act
18 U.S.C. § 1962(c)

228. Paragraph 228 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

229. Paragraph 229 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

230. Paragraph 230 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

231. Paragraph 231 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

232. Paragraph 232 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

233. Paragraph 233 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied. To the extent Plaintiffs argue that this allegation is relevant to the claims that the Court has not yet dismissed, D'Agostino denies that he is a founder, officer, manager of Derwick Associates and denies that at all relevant times he directed, controlled and coordinated the activities of Derwick Associates. This denial applies to all allegations in the Complaint alleging that D'Agostino's involvement with Derwick. In all other respects, denied.

234. Paragraph 234 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

235. Paragraph 235 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

236. Paragraph 236 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

237. Paragraph 237 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

238. Paragraph 238 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

239. Paragraph 239 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

240. Paragraph 240 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

241. Paragraph 241 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

242. Paragraph 242 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

243. Paragraph 243 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

244. Paragraph 244 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

245. Paragraph 245 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

246. Paragraph 246 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

247. Paragraph 247 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

248. Paragraph 248 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

249. Paragraph 249 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

250. Paragraph 250 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

251. Paragraph 251 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

252. Paragraph 252 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

253. Paragraph 253 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

254. Paragraph 254 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

255. Paragraph 255 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

256. Paragraph 256 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied. To the extent Plaintiffs argue that this paragraph is relevant, the allegations in paragraph 256 are denied.

257. Paragraph 257 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied. To the extent Plaintiffs argue that this paragraph is relevant, the allegations in paragraph 257 are denied.

258. Paragraph 258 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied. To the extent Plaintiffs argue that this paragraph is relevant, the allegations in paragraph 258 are denied.

259. Paragraph 259 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

260. Paragraph 260 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied. To the extent Plaintiffs argue that this paragraph is relevant to the claims that have not yet been dismissed, the allegations in paragraph 260 are denied.

261. Paragraph 261 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

262. Paragraph 262 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

263. Paragraph 263 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

264. Paragraph 264 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

265. Paragraph 265 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

266. Paragraph 266 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

267. Paragraph 267 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

268. Paragraph 268 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied. To the extent Plaintiffs argue that this paragraph is relevant to the claims that have not yet been dismissed, the allegations in paragraph 268 are denied.

269. To the extent Plaintiffs argue that this paragraph is relevant to the claims that have not yet been dismissed, the allegations in paragraph 269 are denied.

270. Paragraph 270 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied. To the extent

Plaintiffs argue that this paragraph is relevant to the claims that have not yet been dismissed, the allegations in paragraph 270 are denied.

271. Paragraph 271 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

272. Paragraph 272 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

273. Paragraph 273 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

SECOND CLAIM FOR RELIEF
Racketeer Influenced and Corrupt Organizations Act
18 U.S.C. § 1962(d)

274. Paragraph 274 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

275. Paragraph 275 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

276. Paragraph 276 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

277. Paragraph 277 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

278. Paragraph 278 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

279. Paragraph 279 of the FAC is no longer relevant as the Court has already dismissed the claims related to this allegation and thus the allegations are denied.

THIRD CLAIM FOR RELIEF
Tortious Interference with Prospective Economic Advantage
- ORA's Relationship with Cedeño

280. This paragraph does not contain any allegations and therefore is denied.

281. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 281 of the FAC.

282. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 282 of the FAC.

283. Denies the allegations in paragraph 283 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 283 of the FAC as it relates to others.

284. Denies the allegations in paragraph 284 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 284 of the FAC as it relates to others.

285. Denies the allegations in paragraph 285 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 285 of the FAC as it relates to others.

286. Denies the allegations in paragraph 286 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 286 of the FAC as it relates to others.

287. Denies the allegations in paragraph 287 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 287 of the FAC as it relates to others.

288. Denies the allegations in paragraph 288 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 288 of the FAC as it relates to others.

289. Denies the allegations in paragraph 289 of the FAC.

FOURTH CLAIM FOR RELIEF
Tortious Interference with Prospective Economic Advantage
- ORA's Relationship with Banco Venezolano

290. This paragraph does not contain any allegations and therefore is denied.

291. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 291 of the FAC.

292. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 292 of the FAC.

293. Denies the allegations in paragraph 293 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 293 of the FAC as it relates to others.

294. Denies the allegations in paragraph 294 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 294 of the FAC as it relates to others.

295. Denies the allegations in paragraph 295 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 295 of the FAC as it relates to others.

296. Denies the allegations in paragraph 296 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 296 of the FAC as it relates to others.

297. Denies the allegations in paragraph 297 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 297 of the FAC as it relates to others.

298. Denies the allegations in paragraph 298 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 298 of the FAC as it relates to others.

299. Denies the allegations in paragraph 299 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 299 of the FAC as it relates to others.

300. Denies the allegations in paragraph 300 of the FAC.

FIFTH CLAIM FOR RELIEF
Trade Libel/Injurious Falsehood/Defamation

301. This paragraph does not contain any allegations and therefore is denied.

302. Denies the allegations in paragraph 302 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 302 of the FAC as it relates to others.

303. Denies the allegations in paragraph 303 of the FAC.

304. Denies the allegations in paragraph 304 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 304 of the FAC as it relates to others.

305. Denies the allegations in paragraph 305 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 305 of the FAC as it relates to others.

306. Denies the allegations in paragraph 306 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 306 of the FAC as it relates to others.

307. Denies the allegations in paragraph 307 of the FAC.

308. Denies the allegations in paragraph 308 of the FAC.

309. Denies the allegations in paragraph 309 of the FAC.

SIXTH CLAIM FOR RELIEF
Defamation of Ambassador Reich

310. This paragraph does not contain any allegations and therefore is denied.

311. Denies the allegations in paragraph 311 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 311 of the FAC as it relates to others.

312. Denies the allegations in paragraph 312 of the FAC.

313. Denies the allegations in paragraph 313 of the FAC.

314. Denies the allegations in paragraph 314 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 314 of the FAC as it relates to others.

315. Denies the allegations in paragraph 315 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 315 of the FAC as it relates to others.

316. Denies the allegations in paragraph 316 of the FAC as it relates to himself and denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 316 of the FAC as it relates to others.

317. Denies the allegations in paragraph 317 of the FAC.

318. Denies the allegations in paragraph 318 of the FAC.

319. Denies the allegations in paragraph 319 of the FAC.

SEVENTH CLAIM FOR RELIEF
Civil Conspiracy

320. This paragraph does not contain any allegations and therefore is denied.

321. Paragraph 321 of the FAC is no longer relevant as the Court has already dismissed this claim and thus the allegations are denied. To the extent Plaintiffs contend this allegation is relevant, it is denied.

322. Paragraph 322 of the FAC is no longer relevant as the Court has already dismissed this claim and thus the allegations are denied. To the extent Plaintiffs contend this allegation is relevant, it is denied.

323. Paragraph 323 of the FAC is no longer relevant as the Court has already dismissed this claim and thus the allegations are denied. To the extent Plaintiffs contend this allegation is relevant, it is denied.

324. Paragraph 324 of the FAC is no longer relevant as the Court has already dismissed this claim and thus the allegations are denied. To the extent Plaintiffs contend this allegation is relevant, it is denied.

FIRST AFFIRMATIVE DEFENSE
Failure to State A Claim

325. The FAC fails to state a claim upon which relief may be granted against Mr. D'Agostino.

SECOND AFFIRMATIVE DEFENSE
Lack of Damage Caused by D'Agostino

326. No act or omission on the part of D'Agostino either caused or contributed to whatever injury (if any) the Plaintiffs may have sustained.

THIRD AFFIRMATIVE DEFENSE
Failure to Mitigate Damages

327. Plaintiffs failed to properly mitigate damages.

FOURTH AFFIRMATIVE DEFENSE
Plaintiff as a Public Figure

328. Plaintiff is a public figure.

FIFTH AFFIRMATIVE DEFENSE
Unclean Hands

329. Plaintiffs filed this suit for an improper purpose.

SIXTH AFFIRMATIVE DEFENSE
Opinion

330. Plaintiffs' claims are barred because the allegedly defamatory statements in the FAC are statements of opinion.

SEVENTH AFFIRMATIVE DEFENSE
Failure to join a necessary party

331. Plaintiffs fail to state a claim because the FAC fails to join all necessary parties.

EIGHTH AFFIRMATIVE DEFENSE
No Malice

332. Plaintiffs' claims fail because they are unable to prove any statement by D'Agostino was made with actual malice.

NINTH AFFIRMATIVE DEFENSE
Non-Parties

333. Plaintiffs' claims fail because the alleged damages are the result of actions committed by non-parties.

TENTH AFFIRMATIVE DEFENSE
Speculative

334. Plaintiffs are not entitled to any recovery because the alleged damages, if any, are speculative.

ELEVENTH AFFIRMATIVE DEFENSE
Punitive Damages

335. Plaintiffs' claim for punitive damages is not appropriate and may be unconstitutional.

TWELFTH AFFIRMATIVE DEFENSE
Intracorporate Conspiracy Doctrine

336. Plaintiffs are not entitled to any recovery because of the intracorporate conspiracy doctrine.

D'Agostino reserves the right to assert any additional defenses that are supported by information or facts obtained through discovery or other means during this case and expressly reserves the right to amend his Answer to assert such affirmative defenses in the future.

WHEREFORE, defendant D'Agostino demands judgment dismissing the FAC as against him, awarding to him the costs and expenses, including without limitation, attorneys' fees of this action, and for such other and further relief as the Court may deem just and proper.

Dated: September 16, 2014

SUSMAN GODFREY L.L.P

s/Shawn J. Rabin
William Christopher Carmody (WC8478)
Shawn J. Rabin (SR6546)
560 Lexington Avenue, 15th Floor
New York, NY 10022
Phone: (212) 336-8330
Fax: (212) 336-8340
bcarmody@susmangodfrey.com
srabin@susmangodfrey.com

CERTIFICATE OF SERVICE

I hereby certify this 16th day of September, 2014, that I caused a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification to the following attorneys of record, and is available for viewing and downloading:

Lankler Siffert & Wohl LLP
Frank H. Wohl
Julia C. Green
500 Fifth Avenue, 34th Floor
New York, NY 10110
Attorney for Defendant Leopoldo Lopez

Fox Rothschild LLP
Joseph A. DeMaria
200 South Biscayne Blvd., Suite 3590
Miami, FL 33131
Attorney for Defendant Pedro Lopez

Smith Valliere PLLC
Mark W. Smith
75 Rockefeller Plaza, 21st Floor
New York, NY 10019
Attorney for Plaintiffs

s/Shawn J. Rabin